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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

ROBERT THOMSON,  
Plaintiff,  
v.  
TORRANCE POLICE DEPARTMENT  
and THE LOS ANGELES COUNTY  
SHERIFF'S DEPARTMENT,  
Defendants.

CASE NO. CV 11-06154 SJO(JCx)  
(to be related to CV 10-08377 JAK  
(JEMx) and CV 11-08026 JHN(JCGx)

**LASD REPLY TO PLAINTIFF'S  
OPPOSITION TO RELATING  
CASES**

**[Local Rule 83-1.3]**

Under Central District Local Rule 83.1.3, a case need not be pending for it to be related. The Rule only requires that the related action be "previously filed or currently pending in the Central District" and (a) arise from the same or closely related transaction, happening, or event; (b) call for determination of the same or substantially related or similar questions of law and fact; or (c) for other reasons would entail substantial duplication of labor if heard by different judges." (Central Dist. Local Rule 83.1.3.)

Here, the cases of *Jonathan Birdt v. Charlie Beck, et al.*, United States District Court Case No. CV 10-08377 JAK (JEMx), *Robert Thomson v. Torrance*

HOA.855069.1

Reply to Opp to Notice of Related Cases  
CV 10-08377 JAK(JEMx) /  
CV 11-06154 SJO (JCx),  
CV 11-08026 JHN(JCGx)

1 *Police Department, et al.*, United States District Court Case No. CV 11-06154 SJO  
2 (JCx), and *Sigitas Raulinaitis, et al. v. Los Angeles County Sheriff's Department*,  
3 United States District Court Case No. CV 11-08026 JHN(JCGx) all allege that the  
4 Los Angeles County Sheriff's Department's policy for the issuance of concealed  
5 weapons permits violates the Second Amendment. In light of the identical legal  
6 issues presented in these cases, Defendant LASD submits that litigating these cases  
7 separately will create a substantial duplication of labor if heard by different judges.  
8 Judge Kronstadt recently ruled on the very issues that are the subjects of the  
9 *Thomson* and *Raulinaitis* cases, and is already familiar with the law and the facts.  
10 Having two other judges become familiar with the issues will result in a substantial  
11 and expensive duplication of labor. Moreover, inconsistent rulings may result.  
12 Accordingly, these are Related Cases for the purposes of Local Rule 83.1.3.

13 Additionally, while the parties have filed their respective motions for  
14 summary judgments, the matter has not been fully briefed. The hearing on the  
15 *Thomson* matter is presently set before Judge Otero on February 27, 2012. While  
16 Plaintiff has filed his Oppositions to the Defendants' summary judgment motions,  
17 Defendants have not yet filed their papers. There is no trial date on the *Thomson*  
18 case. The trial date in *Raulinaitis* is September 4, 2012.

19 DATED: January 20, 2012

Respectfully submitted,

20 ANDREA SHERIDAN ORDIN  
21 County Counsel

22 By

/S/  
23 JENNIFER A.D. LEHMAN  
24 Principal Deputy County Counsel

25 Attorneys for Defendant  
26 LOS ANGELES COUNTY SHERIFF'S  
27 DEPARTMENT

28 HOA.855069.1

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